

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

Lordstown Motors Corp., *et al.*¹

Debtors.

Lordstown Motors Corp. and Lordstown EV Corporation,

Plaintiffs,

-against-

Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., Foxconn Ventures Pte. Ltd., Foxconn (Far East) Limited, and Foxconn EV System LLC

Defendants.

Chapter 11

Case No. 23-10831 (MFW)

(Jointly Administered)

Adv. Pro. No. 23-50414 (MFW)

Re: Adv. Proc. D.I. 1, 3 & 5

**CERTIFICATION OF COUNSEL REGARDING ORDER
APPROVING STIPULATION EXTENDING RESPONSE DEADLINE**

Hon Hai Precision Industry Co., Ltd. (a/k/a Hon Hai Technology Group), Foxconn EV Technology, Inc., and Foxconn EV Systems LLC (collectively, “Foxconn”), by and through the undersigned counsel, hereby certify as follows:

¹ The debtors and the last four digits of their respective taxpayer identification numbers are: Lordstown Motors Corp. (3239); Lordstown EV Corporation (2250); and Lordstown EV Sales LLC (9101) (collectively, the “**Debtors**”). The Debtors’ service address is 27000 Hills Tech Ct., Farmington Hills, MI 48331.

1. On June 27, 2023, plaintiffs in the above-captioned adversary proceeding (“**Plaintiffs**,” and together with Foxconn, the “**Parties**”) filed the *Complaint* [A.D.I. 1] (the “**Complaint**”) with the United States Bankruptcy Court for the District of Delaware.

2. On June 30, 2023, Plaintiffs filed the *Summons and Notice of Pretrial Conference in an Adversary Proceeding* [A.D.I. 3], under which Foxconn’s initial deadline to answer, move, or otherwise respond to the Complaint was July 31, 2023 (the “**Response Deadline**”),² and a pretrial conference was scheduled to be held on a date to be determined.

3. On July 31, the Court entered an order [A.D.I. 5] approving the Parties’ *Stipulation Extending Response Deadline*, under which the Parties agreed to extend the Response Deadline to and including September 1, 2023.

4. The Parties have engaged in further discussions regarding the Response Deadline and agreed to further extend the Response Deadline to September 29, 2023, as set forth in the proposed form of order attached hereto as **Exhibit A** (the “**Proposed Order**”) and the stipulation (the “**Stipulation**”) attached thereto as Exhibit 1.

WHEREFORE, Foxconn respectfully requests that the Court enter the Proposed Order attached hereto as **Exhibit A** approving the Stipulation.

² The 30th day following the issuance of the Summons is July 30, 2023; however, as that date falls on a Sunday, pursuant to Federal Rule of Bankruptcy Procedure 9006(a)(1)(C), the Response Deadline extends to Monday, July 31, 2023.

Dated: August 18, 2023
Wilmington, Delaware

**MORRIS, NICHOLS, ARSHT & TUNNELL
LLP**

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